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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF WYOMING**

In re:)	
)	Case No.: 16-20326
POWELL VALLEY HEALTH CARE,)	Chapter 11
INC.,)	
Debtor.)	

**UNOPPOSED JOINT MOTION TO EXTEND TIME FOR LEXINGTON
INSURANCE COMPANY, UMIA INSURANCE, INC., AND HOMELAND
INSURANCE COMPANY OF NEW YORK TO OBJECT TO DISCLOSURE
STATEMENT**

Undersigned counsel for Powell Valley Health Care, Inc. (the “Debtor”), and UMIA Insurance Inc. (“UMIA”) on behalf of itself and Lexington Insurance Company (“Lexington”) and Homeland Insurance Company of New York (“Homeland”) hereby file this Motion to Extend Time for UMIA, Lexington and Homeland to file an objection to the Debtor’s Disclosure Statement (the “Motion”), and in support thereof would show the Court as follows:

1. On May 16, 2016 (the “Petition Date”), the Debtor commenced this case by filing a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the District of Wyoming (the “Bankruptcy Court”).

2. The Debtor has continued in the possession of its property and has continued to operate and manage its business as a debtor-in-possession pursuant to Bankruptcy Code §§ 1107 and 1108.

3. On April 24, 2017, the Debtor filed its Disclosure Statement in Support of Chapter 11 Plan of Reorganization dated April 24, 2017 (the “Disclosure Statement”) (Doc. # 498).

4. On May 12, 2017, this Court ordered that any objections to the proposed Disclosure Statement be filed with the Court on or before June 22, 2017. The Court also set an evidentiary hearing on the Disclosure Statement for July 6, 2017.

5. The Debtor, UMIA, Lexington and Homeland are in the midst of negotiations regarding the treatment of claims between the Debtor, certain of the Debtor’s creditors, UMIA, Lexington and Homeland in the Debtor’s proposed Disclosure Statement and plan of reorganization. UMIA, Lexington, Homeland and the Debtor agree that an extension of the deadline for UMIA, Lexington, and Homeland to object to the Disclosure Statement would be beneficial to the negotiations between these parties.

6. Thus, the Debtor, UMIA, Lexington, and Homeland request that the deadline for UMIA, Lexington and Homeland to file an objection to the Disclosure Statement be extended to on or before July 3, 2017. No party in interest will be

prejudiced by this extension considering, in part, that the scheduled hearing on the Disclosure Statement is not until July 6, 2017.

7. The Debtor has conferred with counsel for the Official Committee of Unsecured Creditors (the “Committee”) with respect to this extension and the Committee’s counsel has indicated that the Committee has no objection with the relief requested in this Motion.

WHEREFORE, for the reasons set forth herein, the Debtor, UMIA, Lexington, and Homeland respectfully request that the Bankruptcy Court extend the deadline for UMIA, Lexington, and Homeland to file an objection to the Debtor’s proposed Disclosure Statement to on or before July 3, 2017.

Dated: Cheyenne, Wyoming

June 22, 2017

MARKUS WILLIAMS YOUNG AND
ZIMMERMANN LLC

By: /s/
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